

IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF ALABAMA
SOUTHERN DIVISION

TRACY DEBOSE LAMPKIN,)
Plaintiff)
v.) CIVIL ACTION NO.
UNITED PARCEL SERVICE, INC,) 1:06-CV-538-WKW
Defendant.)

JOINT MOTION TO EXTEND DISCOVERY AND ASSOCIATED DEADLINES

Plaintiff Tracy Debose Lampkin and Defendant United Parcel Service, Inc. jointly move the Court to extend by sixty (60) days the discovery period in this case and the associated deadlines. The parties have been diligently pursuing discovery, but additional time is needed given scheduling conflicts, ongoing exchanges of written discovery, and Plaintiff's counsel's recent unavoidable leave of absence. Moreover, Plaintiff is working to locate and produce documents responsive to Defendant's discovery requests, which may necessitate further depositions once the documents are produced.

For all of these reasons, the Parties respectfully request that the Court extend by sixty (60) days the discovery period and associated deadlines, including the deadline to file any dispositive motions.

Respectfully submitted this 10th day of September, 2007.

[signatures on following page]

Respectfully submitted this



Crystal M. James

Georgia Bar No. 515292

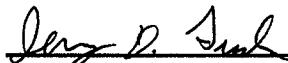
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CERTIFICATE OF SERVICE

I certify that I have filed this date the foregoing JOINT MOTION TO EXTEND
DISCOVERY AND ASSOCIATED DEADLINES with the Clerk of Court using the CM/ECF
system, which will send electronic notification to:

Crystal M. James
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8451 S. Cherokee Blvd., Suite F
Douglasville, GA 30134
jamesllc@bellsouth.net

This 10th day of September, 2007.

Jeremy D. Tucker
Jeremy D. Tucker